

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 20-261 (DSD/TNL)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	DEFENDANT’S MOTION TO
v.)	ALLOW DEFENDANT TO
)	LEAVE THE STATE
ADITYA RAJ SHARMA,)	
)	
Defendant.)	

The purpose of this motion is to request that Mr. Sharma be permitted to leave Minnesota for Arizona for three nights. Probation Officer Krystal Taylor confirmed that Mr. Sharma has complied with all pretrial release conditions, and she has no objection to Mr. Sharma’s travel request. Assistant U.S. Attorney Matthew Ebert defers to Ms. Taylor’s position on the matter. Thus, he does not object.

On November 16, 2020, the Honorable Hildy Bowbeer set conditions of release in Mr. Sharma’s case (ECF No. 7). One such condition is to not travel outside of Minnesota without Court approval (*id.* at p. 2). Mr. Sharma seeks to travel to Mesa, Arizona for work purposes for three nights within the next couple of weeks. He will fly from Minnesota to Arizona and back.¹ The purpose of the trip is to meet with a company to execute a trial of the KloudGaze software.

¹ Mr. Sharma will not purchase his flight or hotel unless this Court grants his travel request. Upon his purchase, he will provide all the details, including the specific dates, flight information, hotel information, etc., to his pretrial services agent, Krystal Taylor.

Mr. Sharma's work commitment requires two full business days, and with the uncertainty of flights, he intends to fly down one day before the meeting. We ask that the Court grant permission to allow Mr. Sharma to travel to Arizona for three nights to accommodate this business trip.

Respectfully submitted,

RYAN GARRY, ATTORNEY, LLC

Dated: February 11, 2021

s/ Elizabeth Duel

Ryan P. Garry (Attorney No. 0336129)
Elizabeth R. Duel (Attorney No. 0393619)
Attorneys for Defendant
333 South Seventh Street, Suite 2350
Minneapolis, MN 55402
Phone: (612) 436-3051
Fax: (612) 436-3052
ryan@ryangarry.com | elizabeth@ryangarry.com

BIRRELL LAW FIRM, PLLC

Andrew S. Birrell (Attorney No. 133760)
Attorneys for Defendant
333 South 7th Street, Suite 2350
Minneapolis, MN 55402
Phone: (612) 238-1939
andy@birrell.law